

**FILED**

August 24, 2022

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: DT  
Deputy

**UNITED STATES OF AMERICA,****Plaintiff,****v.****HUGO JAHIR MEDINA,****Defendant.****Case No: EP:22-CR-01381-KC****INDICTMENT**

§ **CTS 1-2:** 18 U.S.C. § 922(a)(6) and §  
§ 924(a)(2)— Knowingly Making a False  
§ Statement During Purchase of a Firearm;

§ **CTS 3-4:** 18 U.S.C.  
§ § 924(a)(1)(A)—Providing False  
§ Information on Records Required to be  
§ Maintained by a Federal Firearms Licensee.  
§

THE GRAND JURY CHARGES:

**COUNT ONE**

(18 U.S.C. § 922(a)(6) and § 924(a)(2))

That on or about July 15, 2021, within the Western District of Texas, the Defendant,

**HUGO JAHIR MEDINA,**

in connection with the acquisition of Glock model 17 Gen 5 9mm handgun, from M.P.J., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to M.P.J., which statement was intended and likely to deceive M.P.J., as to a fact material to the lawfulness of such sale of said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Records, to the effect that he was the actual buyer of the firearm indicted on that Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearm, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**COUNT TWO**

(18 U.S.C. § 922(a)(6) and § 924(a)(2))

That on or about August 18, 2021, within the Western District of Texas, the Defendant,

**HUGO JAHIR MEDINA,**

in connection with the acquisition of a Glock model 26 Gent 4 9mm handgun, from M.P.J., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to M.P.J., which statement was intended and likely to deceive M.P.J., as to a fact material to the lawfulness of such sale of said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Records, to the effect that he was the actual buyer of the firearm indicted on that Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearm, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**COUNT THREE**

(18 U.S.C. § 924(a)(1)(A))

That on or about July 15, 2021, within the Western District of Texas, the Defendant,

**HUGO JAHIR MEDINA,**

knowingly made false statements and representations to M.P.J., an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of M.P.J. in that when Defendant executed a Bureau of Alcohol, Tobacco, Firearms, and Explosive Form 4473, Firearms Transaction Records. Defendant falsely indicated that he resided at an address in El Paso, Texas, when in fact he did not, in violation of Title 18, United States Code, Section 924(a)(1)(A).

**COUNT FOUR**  
(18 U.S.C. § 924(a)(1)(A))

That on or about August 18, 2021, within the Western District of Texas, the Defendant,

**HUGO JAHIR MEDINA,**

knowingly made false statements and representations to M.P.J., an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of M.P.J. in that when Defendant executed a Bureau of Alcohol, Tobacco, Firearms, and Explosive Form 4473, Firearms Transaction Records. Defendant falsely indicated that he resided at an address in El Paso, Texas, when in fact he did not, in violation of Title 18, United States Code, Section 924(a)(1)(A).

A TRUE BILL.

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FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF  
UNITED STATES ATTORNEY

BY: \_\_\_\_\_

Assistant United States Attorney